

SMITH & KING^{LLC}

www.SmithandKinglaw.com

LONG ISLAND OFFICE:
666 OLD COUNTRY ROAD
SUITE 305
GARDEN CITY, N.Y. 11530
Telephone: (516) 213-0018
Fax: (917) 591-3244

NEW YORK CITY OFFICE:*
900 THIRD AVENUE, 13TH FLOOR
NEW YORK, N.Y. 10022
Telephone: (212) 681-2800
Fax: (917) 591-3244

*Please send all mail to the Garden City Office

David S. Smith, Esq.[†]
Brian King, Esq. (1978-2021)
[†]Admitted in New York and California

July 7, 2025

The Honorable Allyne R. Ross
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *United States v. Feng Jiang*,
Docket No. 1:24-cr-00264-ARR

Your Honor:

As the Court is aware, this firm represents the Defendant Feng Jiang in the above-referenced matter. Sentencing in this matter is currently scheduled for July 23rd, with the Defendant's sentencing submission due this Wednesday, July 9th.

I am writing to respectfully request a continuance of the sentencing date due to a personal medical issue. This past Friday I was involved in accident which resulted in a neck injury. I was hospitalized over the weekend, and have been referred to a spine specialist and neurologist. Unfortunately, I do not anticipate that I will be able to finalize our sentencing submission by this Wednesday.

Accordingly, I am respectfully requesting an adjournment of sentencing to September of this year. I have conferred with AUSA Patrick Cambell, who has indicated that the Government does not oppose this application. Both parties would be available on the following dates in September: 9/15, 9/16, 9/17 or 9/18.

Thank you for considering this request.

Respectfully submitted,

/s/

David Smith, Esq.

cc: AUSA Patrick Cambell